

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document Relates To All Actions

JOINT MOTION FOR ENTRY OF PROPOSED CASE MANAGEMENT 26D

Pursuant to Paragraph B.2 of Case Management Order 26C, the Defense Co-Leads and Defense Coordinating Committee and the Plaintiffs' Executive Committee (collectively, the "Parties") jointly move for the entry of Proposed Case Management Order 26D. In support of this motion, the Parties state as follows:

1. Case Management Order 26C ordered the Parties to propose "a process for selecting the Initial Personal Injury Bellwether Trial Pool Plaintiffs, as well as a schedule for completing such further discovery and trial preparation, up to the selection of the first personal injury bellwether trial."
2. Following extensive negotiations between the Parties and several extensions of the Court's submission deadline, the Parties have reached agreement on the terms of a proposed case management order.
3. Accordingly, the Parties now submit proposed Case Management Order 26D, attached hereto as Exhibit A, for consideration and entry by the Court.

WHEREFORE, the Parties respectfully request that the Court enter proposed Case Management Order 26D, attached as Exhibit A.

Dated: May 6, 2024

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Respectfully submitted,

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